

The 160 meter band, like the 80 meter band, is really two bands in one. On the one hand, it is a good band for local contacts. This activity typically consists of SSB roundtable contacts and ragchewing. On the other hand, it is also a DX band capable of worldwide communication. Because of the extreme difficulty of long distance communication on this band, CW is used by necessity, not just choice. Strong, wide- bandwidth, SSB signals cause great interference to CW signals. This is readily demonstrated by the severe interference caused to CW signals on other bands, such as 80 and 40 meters, by illegal non-amateur SSB signals appearing in the amateur CW sub-bands. One SSB signal can eliminate enough spectrum for many CW contacts. On 160 meters, the potential for interference is worse because SSB signals are legal from within the US and at 1500 watts. Restricting the SSB signals to above 1843 kHz is no hardship, because 80% of the band is still available for that mode. That is a higher ratio of SSB to CW than on any of the other HF bands below 28 MHz. The present voluntary band partitioning has worked well for the vast majority of 160 meter users. However, a tiny minority of rogue stations can create havoc by ignoring the band plan. It is for this minority that we request the commission to put some teeth into the band plan by approving this petition. I have been very active on 160 meters as N6RK for the last 4 years, since 1997, when I purchased a large piece of land specifically to build a significant 160 meter station. My observations from operating the band confirm that many stations that I contact frequently on CW would not be reachable with SSB mode. For example, in one contest weekend using only 100 watts to an omni directional antenna, I have been able to contact nearly every state on CW. On the other hand, I also participate in a "worked all states" SSB net on 1895 kHz. I have found that it is far harder to talk to far away states in SSB mode than CW, even running 1500 watts; thus I am nowhere near to contacting all 50 states on SSB, even with the help of that net. In the past, when I tried to operate on 160 meters using only 100 watts, and working within the constraints of an antenna that would fit on a quarter acre lot, I found that CW was really the only useful mode. This is why CW continues to be essential on 160 meters and needs protection.

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